

EXHIBIT K

From: Lazaroff, Michael S. <MLazaroff@reedsmith.com>
Sent: Tuesday, March 23, 2021 6:42 PM
To: Antonello, Gabrielle
Cc: Solomon, Louis M.; david.stagman@katten.com; Kennedy, John P.; Baio, Joseph; Bower, Elizabeth; McCallen, Benjamin; Fitzmaurice, James
Subject: RE: BSGR v. Soros

*** EXTERNAL EMAIL ***

Counsel:

You asked us in your letter whether plaintiffs would produce a copy of any orders, agreements or other authority that prohibits production of some responsive documents from other proceedings or investigations. Plaintiffs agree to provide a copy of any such orders or agreements in their possession and citations to any such authority. However, Plaintiffs do not agree to provide any log (categorical or document log) regarding documents from other proceedings withheld due to these issues. There is no such requirement in the Federal Rules of Civil Procedure and it is an unduly burdensome and unnecessary request.

As noted in my letter from earlier today, we still do not know what you intend to put in your portion of tomorrow's joint status letter or even the list of issues you intend to raise. Nor do we have a process for finalizing the submission.

In our letter, we have told you the issues we intend to raise. In yesterday's letter, you indicated that there were potentially two issues you would raise with Judge Wang which are what you termed "scope of production" and "confidentiality of documents". Please confirm that these are the only two issues you intend to raise in tomorrow's submission. If not, please let us know whether you intend to raise any other issues.

Thank you,

Michael

From: Lazaroff, Michael S.
Sent: Tuesday, March 23, 2021 7:14 AM
To: 'Antonello, Gabrielle'
Cc: Solomon, Louis M. ; david.stagman@katten.com; Kennedy, John P. ; Baio, Joseph ; Bower, Elizabeth ; McCallen, Benjamin ; zz-Fitzmaurice, James
Subject: RE: BSGR v. Soros

Counsel:

Please see the attached letter.

Thank you,

Michael Lazaroff
mlazaroff@reedsmith.com

Reed Smith LLP

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New York, NY 10022-7650
+1 212 5490412
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From: Antonello, Gabrielle <GAntonello@willkie.com>
Sent: Monday, March 22, 2021 10:02 AM
To: Lazaroff, Michael S. <MLazaroff@reedsmith.com>
Cc: Solomon, Louis M. <LSolomon@reedsmith.com>; david.stagman@katten.com; Kennedy, John P. <JKennedy@reedsmith.com>; Baio, Joseph <jbaio@willkie.com>; Bower, Elizabeth <EBower@WILLKIE.COM>; McCallen, Benjamin <BMcCallen@willkie.com>; zz-Fitzmaurice, James <jfitzmaurice@willkie.com>
Subject: BSGR v. Soros

EXTERNAL E-MAIL - From GAntonello@willkie.com

Michael,

Please see the attached correspondence.

Regards,
Gabrielle

Gabrielle Antonello
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